

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Nebraska

United States of America
v.

MAURICE J. PAOLA

Defendant(s)

Case No. 4:18MJ3127

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2018 in the county of Lincoln in the
 District of Nebraska, the defendant(s) violated:

Code Section
49 U.S.C. § 46504

Offense Description
Interference with flight crew members and attendants

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

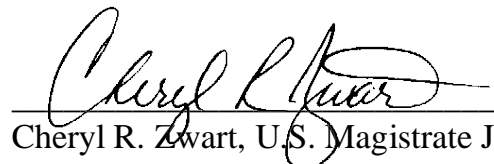

Complainant's signature

Mark A. Cullinan, Special Agent
Printed name and title

Sworn to before me by reliable electronic means:

Date: September 5, 2018.

District of Nebraska


Cheryl R. Zwart, U.S. Magistrate Judge

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Mark A. Cullinan, Special Agent, Federal Bureau of Investigation (FBI), Omaha Division, North Platte Resident Agency, being duly sworn, do depose and state the following:

Your affiant is an FBI Agent assigned to the Omaha Division of the FBI and has been a law enforcement officer for over 26 years. I have been assigned to investigate crimes and violations of federal law, to include investigations of interference with flight crew members and attendants aboard aircraft operating in the special aircraft jurisdiction of the United States. The information contained herein was obtained by your affiant through investigation and review of investigative reports prepared by the FBI and through conversations with additional Federal, State and Local law enforcement officers and witnesses. This affidavit is in support of a complaint for the arrest of Maurice J. Paola. The investigation has uncovered evidence that Paola violated the following federal statutes:

-49 U.S.C. Section 46504, interference with flight crew members and attendants.

-49 U.S.C. Section 46507(2)(A) false information and threats

On 9/3/2018, at approximately 4:50 p.m. Central Standard Time (C.S.T.), the 911 emergency dispatch center for the North Platte Police Department and Lincoln County Sheriff's Office in North Platte, Nebraska, was notified an aircraft enroute from Las Vegas, Nevada to White Plains, New York was being diverted to the North Platte Regional Airport (Lee Bird Field) in North Platte, Nebraska, for an emergency landing due to a disturbance on board. The aircraft was identified in an FAA security incident bulletin as a Gulfstream GLF4 with passengers on board. The twelve passenger jet, tail number N702GH, is operated by the Jet Edge Company and owned

by Geh Air Transportation, LLC, in care of the Clinton Group, 9th Floor, 510 Madison Avenue, New York, NY 10022.

Three North Platte Police Department Officers and three Lincoln County Sheriff's Deputies responded to the airport and met the aircraft on the tarmac away from the terminal building. Upon boarding the plane, the officers encountered Maurice J. Paola, DOB 4/12/95, SSN 090-84-9515, 4575 Dean Martin Drive, Las Vegas, NV, 89103. Paola was standing between four seated passengers near the end of the seats closest to the cockpit. Paola was highly animated/agitated and yelling something incomprehensible, failing to acknowledge the deputy's/officer's presence. Paola was subsequently subdued through the application of a taser, taken into custody and physically removed from the aircraft.

Flight attendant Ericka Sterling-Jensen was contacted by North Platte Police Department Sergeant Kendall Allison. Sterling-Jensen advised the aircrew had picked Paola up in Las Vegas at a "JetSmarter" shuttle location. Approximately forty five minutes after takeoff, Paola became combative with Sterling-Jensen and the other passengers by yelling, cursing and shouting he was going to "kill them and their children" by chopping off their heads, directly threatening a family with a six year old and four year old child seated toward the back of the plane. Paola was also throwing items out of his pockets and other items within reach such as cups, etc. at passengers in the small cabin area, walking back and forth, pounding on the windows, banging his head on the walls and demanding the plane be landed immediately. Paola's actions caused Sterling-Jensen to try to clear the cabin of items which could be thrown and contact pilots Anthony Amendola and Ronald Sanctuary. Amendola left the cockpit and attempted to calm Paola. Paola continued to

scream and cause a disturbance, causing Amendola to believe Paola was a threat to the continued operation and safety of the aircraft, crew and passengers. Sterling-Jensen armed herself with an oxygen bottle and the aircrew barricaded themselves in the cockpit while declaring an emergency. The doors to the cockpit in the aircraft are not fortified and could easily have been breached by Paola in his agitated state. Amendola told the adult male passengers on board to do what they had to do to control Paola and the aircraft made an emergency landing in North Platte, Nebraska.

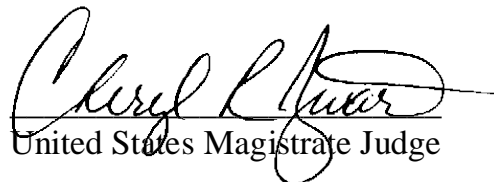
After Paola was removed from the Airplane, the crew taxied the Jet to the terminal area where it was refueled and the passengers were allowed off the plane to decompress and relax. The flight was then re-boarded and departed without Paola to continue the trip to White Plains, NY. Paola was medically cleared at Great Plains Health hospital then taken to the Lincoln County Jail where he was booked and charged with making terroristic threats. His luggage reeked of marijuana and the police department obtained a search warrant for Paola's belongings on 9/4/2018. Forty five grams of marijuana and \$13,250.00 in cash were discovered in a safe in Paola's carry-on luggage. Paola appeared in Lincoln County Court on 9/4/2018 and a \$10,000.00 cash appearance bond (10% of \$100,000.00) was ordered. Paola's next court appearance is scheduled for 9/13/2018.



Mark A. Cullinan
Special Agent
FBI

Sworn to before me by reliable electronic means:

Dated: September 5, 2018.



United States Magistrate Judge